

m/027/007

# JUMBO MINING COMPANY

6305 Fern Spring Cove

Austin, Texas 78730

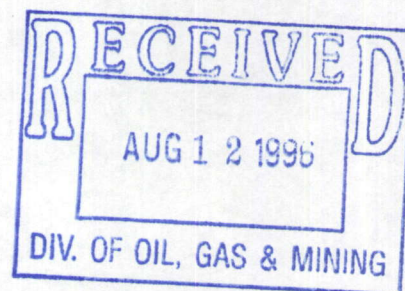
512-346-4537 (Ph.)

512-346-3188 (Fax)

August 6, 1996

File: BLMU8066

Mr. Rex Rowley  
Area Manager  
Bureau of Land Management  
House Range Resource Area  
35 East 500 North, P.O. Box 778  
Fillmore, Utah 84631



Dear Mr. Rowley:

Re: Your letter dated August 1, 1996

We are enclosing herewith copies of our letters to Lowell Braxton of DOGM and to Mark Novak of DEQ, which letters address many of the concerns contained in your subject letter.

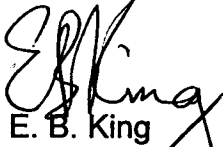
With respect to our answer to your December 13, 1995 letter, please find attached a copy of this letter as drafted, and which apparently had not been sent to you previously. We have added pertinent comments about the resampling which had been earlier requested. Please review these comments and let us know if you agree that resampling is not cost effective in these cases.

We will submit a new POO within 45 days as you have requested. However, we will need to confer with you to determine how best to document the situation described in the attached letter to other agencies.

Meanwhile, we take issue with any assumption that there is degradation of the environment occurring on this property. To the contrary, while we are waiting for final exploration results, resolution of legal questions, and operating plans to be finalized, the site has been steadily improved by such things as the elimination of underground storage tanks, clean up of trash and piping, removal of chemical and oil barrels, and characterization of many other supposed hazardous materials left behind by Western States Minerals Corp.

After you have received and reviewed all of the enclosed documents, please let us know when would be a good time to meet with you to review your requirements for a new POO.

Sincerely,

  
E. B. King

cc: D. Hartshorn, Drum Mine  
W. Hedberg, DOGM  
M. Novak, DWQ, DEQ  
Steven Phirirot, DEQ, DER&R  
Robert Resendes, Director Central Utah Public Health Dept.  
Gary Austin, DEQ, DER&R  
Doug Taylor, DSH  
Roger Foisey, DEQ, District Engineer, Central District  
Jerry Reagan, Millard County Planning and Zoning

# ***JUMBO MINING COMPANY***

***6305 Fern Spring Cove***

***Austin, Texas 78730***

***512-346-4537***

December 29, 1995

Rody Cox  
Bureau of Land Management  
15 East 500 North  
P.O. Box 778  
Fillmore, UT 84631

RE: Response to Bureau' letter dated December 13, 1995

Dear Mr. Cox:

We have received and reviewed the BLM letter dated 12/13/95 and wish to comment on the issues raised in the letter.

## **RESAMPLING OF SAMPLE DM-S-1A**

The sample was collected from the south mixing tank which contains approximately 3,700 pounds of lime. The total amount of cyanide remaining in the tank was calculated to be less than 2 pounds. Jumbo will resample the tank sludge and run a Reactivity Test on it.

[Note that since this draft letter was written, peroxide has been added to this tank in sufficient quantities to kill the 2 pounds of cyanide it originally contained. Thus, we contend that the remaining contents of this steel mixing tank do not now represent any hazard.]

## **RESAMPLING OF SAMPLE DM-S-4**

The sample was a composite of soil collected from the battery storage area. The amount of contaminated soil (rock) was determined to be 4,000 pounds and contains 0.55 pounds of lead. We will resample the material and run a Toxic Characteristic Leaching Procedure test on the sample.

[Again, note that 0.55 pounds is a de minimus quantity of old lead battery, and represents a concentration of only 125 parts per million of lead in the soil as it lies. We suggest that it is not worth the cost of further sampling, assaying, or other disposal action.]

### UNDERGROUND STORAGE TANKS

The tanks have been removed and the underlying soil sampled. A copy of the results have already been submitted to the Bureau. DERR has sent us a letter (copy enclosed) stating that no corrective action is required at the mine.

### HEAP DISCHARGE

A meeting was held with the Division of Water Quality (DWQ) on December 20, 1995 and the current status of existing heaps was discussed. I stated that a complete sampling program of heap runoff will be conducted in early spring. Larry Mize of DWQ stated that if we proceeded with our plan to restack the existing heap material on the new approved heap, then sampling of heap drainage and any possible corrective action will not be needed.

### INTERIM MAINTENANCE PLAN

Since we are planning to restack the old heap material onto the new heap, reclamation will be covered under our new heap operation plan. Therefore, a revised reclamation plan for the existing heaps will not be needed.

If you have any questions, please call me at 864-4697.

Sincerely,

Dave Hartshorn  
Project Manager